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NAVFAC WASHINGTON COMMENTS ON DRAFT WORK PLAN REMEDIAL/ REMOVAL ACTION FOR SITE 42 AND SITE 17 NSWC INDIAN HEAD MD
5/20/2005
NAVFAC WASHINGTON

NAVFAC Washington Comments on
Draft Work Plan Remedial/Removal Action
for Site 42 – Olsen Road Landfill and Site 17
Naval District Washington - Indian Head
May 20, 2005

These comments were generated following review of the draft Remedial/Removal Action Work Plan for Sites 42 and 17.

General

Some sections (e.g. SSHSP) have been sent off for outside review and any comments received will be provided as soon as they arrive.

Section 1.2.1, page 1-2

In the 3rd paragraph, the correct chemical name for TCE is trichloroethane.

Section 2.3.1, page 2-3

In the 1st paragraph, change NTR to ROICC.

In the 2nd bullet, Appendix 6 should be Appendix G.

Section 2.3.1, page 2-3

In the 1st paragraph, should Site Supervisor be Operations Supervisor (per Figure 2-1)?

Section 3.1.9, page 3-7

In the 2nd paragraph, 3rd sentence, the meaning of "threes" is not understood – is it a typo?

Section 3.1.19, page 3-13

This section refers to a maintenance program for the wetland mitigation area – who will develop this?

Section 3.1.19.2, page 3-13

The Installation Natural Resources Manager will also be involved in approving the layout of plants and limits of each zone.

Section 3.2, page 3-15

That there are *approximately* 30 drums to be removed and that most, if not all, of them are in a disintegrated condition should be indicated. The intact drums were previously removed by Shaw.

Section 3.2.7, page 3-18

As noted previously, the intact drums were previously removed and those that remain are not intact. Therefore, it is more likely that an excavator will be used to remove the drums from the soil, without a drum sling.

Section 3.5, page 3-20

The final Closeout Report will be produced within 60 days of receipt of all comments (regulators are entitled to 60 days to respond to the draft).

Section 4.0, page 4-1
In the 1st bullet, "excavation as" should be "excavation at", and "In additional" should be "In addition".

Table 4-1, pages 4-2, 4-3
The small text is hard to read.

Section 4.1.2, page 4-4
In the 1st paragraph, the 2nd sentence should end at "zinc" and "results" should begin the next sentence.

In the 2nd paragraph, the samples should be sediment rather than soil.

Will the technique described for collecting the volatile sample work?

Section 4.1.2, page 4-5
Non-disposable sampling equipment should also be cleaned *before* sampling.

Section 4.1.3, page 4-5
Waste drums should also be properly labeled.

Section 4.2, page 4-6
There is a sample numbering protocol used for Indian Head that should be followed. At the least, the matrix should indicate soil, sediment, surface water, etc.

Section 4.4, page 4-8
The last bullet refers to Section 3.20 for labeling; it should refer to Section 4.2.

Section 4.5, page 4-8
Is tap water 1) organic-free and 2) available at the site?

Section 4.6 page 4-9
Include under the 2nd bullet that the gloves should not even touch sample media when organics are the chemicals of interest.

Section 4.7, page 4-9
Indicate that the daily field notes will be maintained in a *dedicated* logbook.

Section 4.8, page 4-11
In the last paragraph of the section, refer to Section 4.2 for the labeling protocol.

Figure 1-3
If possible, delete the building number (1551) in the southwest corner.

Figure 2-1
Correct the spelling of "MANGAGER" in the FSSI box.

Appendix A
The schedule will require adjustment.

Appendix E
Environmental Protection Plan

Section 3.5
Verify that the soil has been characterized to contain ammunition casings – does not seem correct.

Section 7.4.3
Given the potential for any site at NDW Indian Head to contain ordnance, it would be prudent to include basic munitions recognition training.

Section 11.0
Add Site Approval to the list of permits required for Site 42.

Appendix G
Figure 1-1
The Program Manager position has been reassigned.

Exhibit VI-1A Submittal Register Site 42
Add "G" to the Approving Authority column for the APP, HASP, EPP, and SECP. Also, the register seems incomplete in this respect for other submittals.

Attachment 1 Program Quality Control Plan
The Program Manager position has been reassigned.

Naval Facilities Engineering Service Center Comments on Draft Work Plan Remedial/Removal Action for Site 42 – Olsen Road Landfill and Site 17 Naval District Washington - Indian Head June 3, 2005

These comments were generated following review of the draft Environmental Protection Plan for Sites 42 and 17.

+ Figure 5-1 (Site 42): Boundaries of site 42 are not clearly delineated in the figure (e.g. compare the figure for site 17)

+ Figures 5-1 and 5-2: Location of planned construction is not always noted (e.g., access roads or decon pads)

+ Page 5-1 and 8-1 discusses evacuation and use of a windsock and the desire to evacuate up-wind in the event evacuation is needed. Fig 5-1 shows three meeting points. Not clear how this would be coordinated / which meeting point etc. Probably this is not ever going to be needed (unlikely to need to use the evacuation plan for this simple site) however this was not very clear.

+ Page 3-2, Paragraph 3.5 discusses hazardous material and implies that some of the material to be removed from Site 42 will be hazardous waste and will require manifesting. The work plan needs to have a much fuller discussion of this area (perhaps it is in some other section that I have not seen).

The discussion should address the location of the "on-base material handling area" (ideally this area should be within Site 42 boundaries / and near your decon area). The problem here is that you can get afoul of hazardous waste regulations if you are moving excavated materials around and piling them up ... and the materials may be hazardous waste.

What are you going to write on the waste manifests (The materials will have to sit somewhere till you get the results of your analysis back... This section and subject needs to be looked at carefully and you will want to make sure whoever (state or federal) is regulating this site approves your plans.

Navy Environmental Health Center
Environmental Programs Directorate Comments on
Draft Work Plan Remedial/Removal Action
for Site 42 – Olsen Road Landfill and Site 17
Naval District Washington - Indian Head
June 28, 2005

These comments were generated following review of the draft Health and Safety Plan for Sites 42 and 17.

Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comment: We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references. The acronyms used in our comments are attached.

Administrative Comments:

1. This document is noted to be confusing and incomplete. We suggest the following site for assistance in preparing an acceptable health and safety plan: http://www.osha.gov/dep/etools/ehasp. This e-tool can be downloaded and used for creating site-specific health and safety plans. An additional source of guidance can be found at http://www-nehc.med.navy.mil/downloads/ep/checklist002.pdf. This site provides a checklist, which will assist in preparing the HASP ensuring all required information is included.

2. Various Shaw Health and Safety Procedures such as HS400, "Working in Hot Environments," HS045, "Job Safety Analysis," HS600, "Personal Protective Equipment," and HS601, "Respiratory Protection Program," are cited as guiding documents for this project. These procedural documents should be made available on-site for review or the pertinent information incorporated into the health and safety plan.

3. Neither location nor site maps were included in this document for Site 17 or Site 42. A location map will show the general area where the site is located in relation to the base or surrounding area in general. Site maps show the proposed layout of the site, such as location of

proposed work, decontamination facilities and/or major structures or obstacles such as buildings, roads, gullies, or bodies of water, etc.

4. This document needs a thorough proof reading to eliminate grammatical errors.

Specific Comments:

1. Page 1-2, Section 1.4, "Disclaimer":

Comment: This section appears to be generic and it is unclear what information/guidance is being provided. The health and safety plan document is intended to be site-specific, addressing those tasks the contractor/subcontractor/s is/are hired to perform.

Recommendation: If Shaw Environmental will be the prime contractor, their subcontractor/s should, as a minimum, submit properly completed activity hazard analysis describing the specific task/s the subcontractor is hired to perform to the appropriate Shaw representative for approval. The subcontractor, as the subject matter expert, would assign his own supervisory personnel. This procedure would eliminate the need for multiple HASPs.

2. Pages 2-1 through 2-3, Section 2.0, "Site History/Scope of Work":

Comments:

a. Section 2.1, "Background," third paragraph, first sentence states "A removal action to mitigate silver contamination was performed on two swales that drain from Site 5, the Grain manufacture and X-Ray building, into swales located west and south of Site 42." It is unclear what effect this information has on the scope of work intended for Site 42. Additionally, information noted in the Work Plan, Section 1.0, "Introduction," page 1-2, third paragraph states "A Remedial Investigation (RI) identified localized "hot spots" containing ethyl benzene, toluene, and xylene indicating fuel-related contaminants in subsurface soils." Further information also cites the presence of TCE, several pesticides, SVOCs, VOCs, and some metals, including silver at Site 42.

b. Section 2.2, "Scope of Work" is confusing and difficult to follow. For example, the section starts by providing information for Site 17, then the third paragraph provides a listing of tasks that appear to apply to Site 42. This paragraph is not identified nor does it provide any narrative as noted in the first two paragraphs relating to Site 17.

Recommendations:

a. Revise the final site-specific health and safety plan to reflect what COPCs are anticipated on this site. The AHAs should specify which activity is associated with which COPCs.

b. Revise this entire section, identifying what information applies to which site and in an appropriate sequence, clearly delineating/distinguishing between the two sites. We recommend separate sections describing the details such as Section 2.21, "Site 17," and Section 2.2.2, "Olsen Road Landfill."

3. Page 3-1, Section 3.0, "Key Personnel and Management":

Comment: The fourth sentence of the second paragraph states, "The SS/SSO will be the main contact in any on-site emergency situation and will insure off-site emergency agencies have been contacted prior to start of work." Both of these officials are listed as "TBD." As this document is intended to be site-specific, the names of these company officials should be readily available.

Recommendation: Appoint an appropriate company official to fill this/these important post/s so that the important functions of the position can be accomplished in a timely manner.

4. Pages 4-1 through 4-19, Section 4.0, "Activity Hazards":

Comments:

a. Pages 4-1 through 4-3, information provided in the table entitled "Levels of Site Contaminants" lists PAHs as site COPCs. Table 4-1 includes no information pertaining to these PAHs.

b. Section 4.2, "Hazard Communication," cites 29 CFR 1926.59 as the guiding reference for hazard communication issues. The more appropriate citation is 29 CFR 1910.1200.

c. Section 4.2.3, "Employee Information and Training," cites 29 CFR 1910.120 for HAZWOPER training information.

d. Section 4.4.1, "Heat Stress," cites the "Shaw Health and Safety Procedure HS400, Working in Hot Environments" as outlining methods for preventing heat stress injuries. This document was not provided for review so we cannot comment on its completeness. However, information describing the signs, symptoms and the proper field treatment and management of heat stress injuries was not included in this HASP.

e. Page 4-6, Table 4.2, Guidelines For Work-Rest Periods Protection Level Number of Hours Before Rest Period": It is unclear how the guidance for Level C PPE and above was determined.

f. Pages 4-5 and 4-6, Section 4.4.1, "Heat Stress" fourth paragraph states "Each individual will count his/her radial (wrist) pulse as early as possible during each rest period. If the heart rate exceeds 75 percent of their calculated maximum heart rate (MHR = 200 – age) at the beginning of the rest period, then the cycle will be decreased by one-third." Guidance provided in the ACGIH TLV/BEI, dated 2005, recommends the use of a heart rate (HR=180 –age) vice 200.

g. Section 4.7, "Activity Hazard Analysis": The first sentence states "Attachment 3 contains Activity Hazard Analyses (AHA) for primary tasks." The only AHA noted in Attachment 3 addresses the task of mobilization only. Guidance for drum handling, trenching, excavation, sampling, decontamination of heavy equipment, or other potential tasks are not provided.

Recommendations:

a. Include information relating to PAHs in the final HASP or provide the rationale for not doing so.

b. Revise the final plan to cite 29 CFR 1910.1200 for hazard communication guidance.

c. We recommend referencing both the 29 CFR 1910.120 and 29 CFR 1926.65 in the final health and safety plan.

d. Revise the final health and safety plan to include guidance describing the signs, symptoms and the proper field treatment and management of heat stress injuries. This information may be included as an appendix or attachment or by stating that HS400 will be available on-site for site-personnel use.

e. We recommend the use of the heat stress monitoring guidelines found in the ACGIH Threshold Limit Values for Chemical Substances and Physical Agents & Biological Exposures Indices, dated 2004 or later. Additional heat stress guidance may be found in the NIOSH/OSHA/USCG/EPA *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, DHHS (NIOSH) Publication 85-115, October 1985 and the U. S. EPA *Standard Operating Safety Guides*, Publication 9285.1-03, June 1992.

f. We recommend revising the final HASP using the recommendations found in ACGIH guidelines.

g. Revise the final health and safety plan to include completed AHAs for all major tasks, such as drum handling, soil sampling, or trenching that will be performed under this scope of work. We recommend use of the three column format found in the U. S. Army Corps of Engineers Safety and Health Requirements Manual, page 8, Figure 1-2, EM 385-1-1, 2003, for its simplicity and ease of use to assist in ensuring completeness of the AHAs.

5. Page 6-1, Table 6.1, "Anticipated Protection Levels":
Page 8-1, Table 8.1, "Direct Reading Air Monitoring Requirements":

Comment: Guidance for "Site 17: Excavation of Materials and Drum Overpacking" directs the initial use of Level D/Modified Level D PPE with possible upgrade to Level B PPE if subsurface barrels or surface barrels containing unknown materials or liquids encountered. Guidance noted in Table 8.2, "Direct Reading Air Monitoring Requirements" for Site 17 directs upgrade to Level B if an action level of greater than or equal to 1.0 ppm is noted. It is unclear what substance/s site workers are protecting against as no information is included stating what compound/s would generate this response.

Recommendation: Revise the final site-specific HASP to include information clearly stating what COPCs are being monitored.

6. Page 7-3, Section 7.3, "Disposal":

Comment: The first sentence state "All decontamination liquids and disposable clothing will be treated as contaminated waste unless determined otherwise by accepted testing methods." It is unclear if this waste will be containerized until testing is completed to determine acceptable method/s of disposal.

Recommendation: Include information stating that all spent decontamination liquids will be containerized until test results are available.

7. Pages 8-1 through 8-5, Section 8.0, "Air Monitoring":

Comment: On page 8-3, information provided in Section 8.2.1.3, entitled "Calibration Methods/Frequency" discuses the calibration of the combustible gas indicator (CGI) meter and "recommends" the CGI be calibrated before and after each use. Then on page 8-5, Section 8.4, entitled "Calibration Requirements," the first sentence states "The PID and the LEL/02/H2S will be calibrated daily before use."

Recommendation: Revise the final HASP to clearly state that all direct reading air monitoring equipment will be calibrated daily before and after each period of use in accordance with manufacturers' instructions and standard industrial hygiene practice.

8. Pages 9-1 through 9-15, Section 9.0, "Emergency Response":

Comments:

a. Section 9.1, "Pre-Emergency Planning," the third paragraph, third bullet states, "It will be the responsibility of the Site Supervisor to brief the on-site response team on anticipated hazards at the site. The Emergency Coordinator shall be responsible for anticipating and requesting equipment that will be needed for response activities." It is unclear what response team (i.e. Shaw employees or off-site emergency responders) is being briefed. Information provided in Section 3.1, "Project Safety Responsibilities," the third sentence states "The SS/SSO will be the main contact in any emergency situation and will insure off-site emergency agencies have been contacted prior to the start of work." It is unclear if the Site Supervisor and the Emergency Coordinator are different officials or one and the same official.

b. Reference is made in several areas of this section to a "Local Emergency Management Agency (EMA)." It is unclear what organization is being cited. The "Local Emergency Planning Committee (LEPC)" a standing committee required under SARA Title III would be a more appropriate point of contact.

c. Page 9-3, Table 9.1, "Emergency Telephone Numbers": A Regional Poison Control Center telephone number (800) 282-5846 could not be reached from the reviewers' calling area. The National Poison Control Information Center (800) 222-1212 will place the caller in contact with the poison control center closest to where the call is placed. Further, the Center for Disease Control is listed as a Federal Point of Contact (POC). A more appropriate POC is the National Response Center at (800) 424-8802.

d. Section 9.3.6, "Evacuation Procedures," second paragraph, third bullet states "Drills must be held annually, at a minimum, to practice all of these procedures and will be treated with the same seriousness as an actual emergency."

e. Section 9.4.5, "Medical Emergency Contingency Measures": The last sentence states, "A minimum of two first-aid/CPR trained personnel will be maintained on site." It is unclear if the first-aid/CPR responders have also received Bloodborne Pathogens training as codified at 29 CFR 1910.1030.

f. Section 9.4.6, "Response, Life-Threatening Incident": Information or guidance stating how a seriously injured, contaminated worker would be decontaminated is not included in this HASP. For example, the casualty would be wrapped in a blanket to prevent contamination of the ambulance and accompanied by a site officer to assist with decontamination at the medical facility,

Recommendations:

a. Revise the final HASP to clearly state what response group will be briefed, either Shaw Environmental or off-site responders. Use consistent terminology throughout the HASP to prevent confusion. Additionally, if Shaw Environmental employees will be providing emergency response, then information regarding their level of training; for example, first responder awareness level, first responder operations level, hazardous materials technician or hazardous materials specialist, must be included in the HASP.

b. Contact the Base RPM to determine the correct point of contact. Include the telephone number for contacting the LEPC in the final HASP.

c. Revise the final HASP to include the more appropriate POCs and the correct telephone numbers. All emergency responders' telephone numbers should be verified prior to the start of on-site operations.

d. Emergency response drills should be conducted as soon as feasible after a new site is activated. These drills or actual events must also be critiqued for lessons learned.

e. Revise the final HASP to include information stating the first-aid/CPR have received the Bloodborne Pathogens training in accordance with the requirements of 29 CFR 1910.1030.

f. Include guidance in the final HASP stating how a seriously injured contaminated worker would be managed.

9. Page 10-1, Section 10.0, "Training Requirements":

Comments:

a. The third sentence of the first paragraph states, "In addition, all personnel must receive annual 8-hour refresher training and three-day on-site training under a trained, experienced Superintendent." The three-day on-site supervised training applies to the initial 40-hour training program and not the 8-hour refresher training cycle.

b. Information provided in the third paragraph cites 29 CFR 1926.59 as the guidance document requiring Hazard Communication training. The more appropriate citation is 29 CFR 1910.1200.

Recommendations:

a. Revise the first paragraph to incorporate the three-day on-site training requirement under a trained, experienced, supervisor, vice Superintendent with the initial 40 hour HAZWOPER training. Additionally, revise the third sentence to read, "In addition, all personnel must receive annual 8-hour refresher training."

b. Revise the final HASP to cite 29 CFR 1910.1200 as the Hazard Communication reference.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
COC:	Contaminant of Concern
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEL	Lower Explosive Limit
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value